

**R E M A R K S**

Applicant has carefully considered the above identified Office Action, and in response thereto is addressing each issue raised by the examiner in the remarks hereinbelow. In this regard canceling without prejudice claim 10.

**Claim Rejection 35 USC 112**

Applicant has canceled claim 10. Therefore the 112 rejection concerning claim 10 is moot.

**Claim Rejection 35 USC 102**

Applicant respectfully disagrees with examiner concerning her rejection of claims 35 and 39. The Zoffel et al. patent does not teach or suggest storing data indicative of the second collection agency. Zoffel et al. teaches retrieving data from a repository, but not storing data of a second collection agency. Invalidity for anticipation, under 35 USC 102 requires that each and every limitation of the claim be found within a single prior art reference. Zoffel et al. does not teach each and every limitation recited in claims 35 and 39.

**Claim Rejection 35 USC 103(a)**

Applicant respectfully disagrees with examiner concerning her rejection of claims 1, 19, 23 and 27. The Zoffel et al. patent does not teach or suggest storing data indicative of the

second collection agency. Zoffel et al. teaches retrieving data from a repository and not storing data of a second collection agency.

According to MPEP 2143, there are three requirements to establish a case of obviousness under 35 USC 103:

- 1) There must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the teachings.
- 2) There must be a reasonable expectation of success.
- 3) The prior art reference must teach or suggest all claim limitations.

There is no suggestion or motivation to modify a reference or combine teachings of multiple references, where none of the cited references discloses a claim limitation. There can be no reasonable expectation of success, where none of the cited references disclose a claim limitation. The none of the prior art references teach or suggest all claim limitations. Namely, none of the references teach or suggest "storing data indicative of the second collection agency." All claims dependent upon a newly allowable base claim are also allowable.

C O N C L U S I O N

It is respectfully submitted that applicant has responded in a fully satisfactory manner to all matters at issue in this application, and this application is now in condition for allowance. In this regard, applicant has made every effort to comply with the requirements set forth in this Office Action as well as statutory requirements. Accordingly, applicant respectfully requests that the Examiner enter this amendment, allow the claims, and pass this application on to issue.

Respectfully submitted,



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